

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA  
NORTHERN DIVISION**

**GLENDORA TURNER,  
Individually, and as  
Administratrix of the Estate of  
WILLIAM LEE TURNER,  
Deceased,**

**Plaintiff,**

**v.**

**MERCK & CO., INC., a foreign  
Corporation, ANNE BRANDON,  
an individual, LAMONDE  
RUSSELL, an individual, *et al.*,**

**Defendants.**

**Case No.:** \_\_\_\_\_

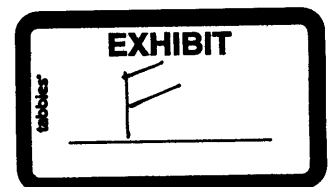
**Removed from the Circuit  
Court of Bullock County,  
Alabama**

**DECLARATION OF LAMONDE RUSSELL**

1. My name is Lamonde Russell. I am over twenty-one years of age, am of sound mind, and am competent to make this declaration. This declaration is based upon my personal knowledge.

2. At no time did I ever provide Vioxx® or information concerning Vioxx® directly to William Lee Turner or Glendora Turner.

3. I am not a physician or pharmacist. I have never prescribed, nor filled a prescription for, Vioxx®. What knowledge I had during my employment concerning Vioxx® was provided to me by my employer.



4. At no time did I have any involvement at all with the manufacture, development, or testing of Vioxx®. The physicians with whom I dealt and on whom I called in my job were highly skilled professionals. They were, in my judgment and to the best of my knowledge, in a better position than I to make determinations concerning prescribing Vioxx®. I had no dealings at all at any time with any patients of any of the physicians on whom I called, and had no knowledge or information of any of those patients' medical histories, symptoms, prognoses, or courses of treatment.

5. At no time did I ever sell, offer to sell or take orders for the sale of Vioxx® to patients. Physicians upon whom I would call would write their prescriptions for Vioxx® based upon their own independent medical knowledge and judgment and I would not have direct knowledge of any specific prescriptions these physicians may have written for individual patients including but not limited to William Lee Turner.

6. I have never promoted or detailed Vioxx® in Bullock County, Alabama. I have never met nor spoken with William Lee Turner or Glendora Turner.

7. I have never made any presentations to the general public regarding Vioxx®.

Pursuant to 28 U.S.C. §1746, I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on July 28, 2005.

  
Lamonde Russell